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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ERNEST BOCK, L.L.C.,

CASE NO.: 2:19-cv-01065-JAD-EJY

Plaintiff,

vs.

PAUL STEELMAN, individually;
MARYANN STEELMAN, individually;
PAUL STEELMAN, as trustee of the
Steelman Asset Protection Trust;
MARYANN STEELMAN, as trustee of
the Steelman Asset Protection Trust; JIM
MAIN, as trustee of the Steelman Asset
Protection Trust; STEPHEN STEELMAN;
SUZANNE STEELMAN TAYLOR;
PAUL STEELMAN, as trustee of the Paul
C. Steelman and Maryann T. Steelman
Revocable Living Trust; MARYANN
STEELMAN, as trustee of the Paul C.
Steelman and Maryann T. Steelman
Revocable Living Trust; PAUL
STEELMAN, as the trustee of the Paul
Steelman Gaming Asset Protection Trust;
KEEPSAKE, INC.; SMMR, LLC; SMMR,
LLC SERIES A-Z; SSSSS, LLC; SSSSS,
LLC, SERIES B; CHRISTIANIA, LLC;
CHRISTIANIA, LLC, SERIES A-Z;
COMPETITION INTERACTIVE, LLC;
PAUL STEELMAN, LTD.; STEELMAN
PARTNERS, LLP; PAUL STEELMAN
DESIGN GROUP, INC.; SAPT
HOLDINGS, LLC, SERIES B; AARON
SQUIRES; and MATTHEW MAHANEY

Defendants.

**STIPULATION EXTENDING BRIEFING
DEADLINE FOR MOTION TO COMPEL**

(FIRST REQUEST)

Plaintiff Ernest Bock, L.L.C. (“Bock”), through the law firm of Hankin Sandman Palladino Weintrob & Bell, P.C.; Defendants Paul Steelman, Maryann Steelman, Paul Steelman as the trustee of the Steelman Asset Protection Trust, Maryann Steelman as the trustee of the Steelman Asset Protection Trust; Stephen Steelman, Suzanne Steelman Taylor, Paul Steelman as the trustee of the Paul C. Steelman and Maryann T. Steelman Revocable Living Trust, Maryann Steelman as the trustee of the Paul C. Steelman and Maryann T. Steelman Revocable Living Trust; Paul Steelman as the trustee of the Paul Steelman Gaming Asset Protection Trust (collectively, the “Steelman Parties”), through the law firm of Brownstein Hyatt Farber Schreck, LLP; Defendants Christiania, LLC, Christiania, LLC, Series A-Z, Competition Interactive, LLC, Keepsake, Inc., Paul Steelman Design Group, Inc., Paul Steelman, Ltd., SAPT Holdings, LLC, Series B, SMMR, LLC, SMMR, LLC, Series A-Z, SSSSS, LLC, SSSSS, LLC, Series B, and Steelman Partners, LLP (collectively, the “Corporate Defendants”), through the law firm of Greenberg Traurig, LLP; and Defendant Matthew Mahaney (collectively, “Attorney Defendant”), by and through his counsel, the law firm Solomon Dwiggin Freer & Steadman, Ltd., hereby submit this Stipulation (the “Stipulation”), subject to this Court’s approval, to continue the briefing deadlines relating to Plaintiff’s Motion to Compel Discovery (ECF No. 269), which are currently set as follows: Response deadline of September 27, 2024, and a Reply deadline of October 4, 2024. This is the parties’ first request to extend these deadlines.

1. On July 31, 2024, the Court held a Status Check regarding discovery in this matter. (ECF No. 267.)

2. During the hearing, the Court ordered a briefing schedule for Plaintiff’s Motion to Compel relating to the Defendants’ privilege logs as follows: Motion deadline of September 13, 2024, Response deadline of September 27, 2024, and a Reply deadline of October 4, 2024. (*See id.*)

3. Following the hearing, and in the interest of attempting to resolve any portion of the dispute amicably and without Court intervention, the Steelman Parties began re-reviewing and analyzing all entries on their privilege log. As the privilege log is voluminous, this process has required counsel to dedicate significant hours to the project.

1 4. Before filing the Motion to Compel, the Steelman Parties continued their review of
2 their privilege log and engaged with Plaintiff with continued meet and confer efforts that the parties
3 would extend beyond the filing of the Motion to Compel given the age of the dispute, the
4 complexity of the privilege issues, and the volume of material to review and analyze.

5 5. On September 13, 2024, Plaintiff filed its Motion to Compel (ECF No. 269),
6 identifying particular line items of the privilege log that it takes issue with, as well as making
7 general arguments about certain privilege assertions.

8 6. Because the Steelman Parties are still engaging in the re-review and analysis of the
9 privilege log and the specific items listed by Plaintiff, counsel for the Steelman Parties reached out
10 to Plaintiff's counsel noting that the review may resolve some of the disputed issues raised in the
11 Motion to Compel and seeking, in the interest of judicial economy and the preservation of the time
12 and resources of the parties, a short two-week extension of the briefing deadlines to continue their
13 meet and confer efforts.

14 7. Counsel for Plaintiff agreed to the same, and the parties hereby submit to the Court,
15 subject to the Court's approval, the following proposed deadlines: Response deadline of October
16 11, 2024, and a Reply deadline of October 18, 2024.

17 8. Because the short extension will provide the Steelman Parties with the time necessary
18 to determine whether some of the issues in the Motion to Compel can be resolved without Court
19 intervention, the parties submit that good cause exists to grant the stipulation and extend the
20 deadlines as requested herein.

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9. Based on the foregoing, the parties respectfully request that the Court grant the stipulation and approve the deadlines outlined herein.

Dated: September 26, 2024.

**WEINBERG, WHEELER, HUDGINS,
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Dated: September 26, 2024.

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Attorneys for the Steelman Defendants

ORDER

IT IS SO ORDERED.


 U.S. MAGISTRATE JUDGE

Dated: September 26, 2024